

UNITED STATES DISTRICT COURT  
DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA,  
**Plaintiff**

**v.**

- 1) Genesis GV80, VIN:  
KMUHCECOMU057308 with PR  
license plate number JRF001.
- 2) \$980.00 in United States currency.
- 3) 2003 Ford F-350, VIN:  
1FDWF37FX3EA19386, with PR license  
plate number H72313.
- 4) \$491,243.93 in United States currency.
- 5) \$325,673.58 in United States currency.
- 6) \$34,010.00 in United States currency.
- 7) \$933.00 in United States currency.

**Defendants *in Rem*.**

CIVIL NO. 24-

**MOTION TO STAY PURSUANT 18 U.S.C. § 981(g)**

TO THE HONORABLE COURT:

COMES NOW, the United States of America, in support of its Motion to Stay,  
respectfully states as follows:

1. The United States has filed against the Defendants *in Rem* a Verified Complaint for  
Forfeiture *in Rem* seeking forfeiture pursuant to 18 U.S.C. §§ 981 (a)(1)(a) and  
(a)(1)(C), as well as 18 U.S.C. §§ 371, 1956(h), and 2314.
2. Civil discovery in this matter will adversely affect the prosecution of a related

criminal case in *United States v. [1] Jame A. Perez-Hernandez et als.*, Criminal No. 24-097 (PAD).

3. 18 U.S.C. § 981(g)(1) states: “Upon the motion of the United States, the Court shall stay the civil forfeiture proceedings if the court determines that civil discovery will adversely affect the ability of the Government to conduct a related criminal investigation or the prosecution of a related criminal case.”
4. In addition, § 981(g)(5) provides that the United States may, in support of its motion for a stay, “submit evidence *ex parte* in order to avoid disclosing any matter that may adversely affect an ongoing criminal investigation.”
5. The United States requests a stay to allow the criminal prosecution to proceed free of the adverse effect of discovery, evidentiary hearings, or other proceedings in this action.

WHEREFORE, the United States respectfully requests that the Court stay this action pending the conclusion of the criminal case, or until further order of the Court.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 11<sup>th</sup> day of September 2024.

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